

1 HANSON BRIDGETT LLP  
RAFFI V. ZEROUNIAN, SBN 236388  
2 rzerounian@hansonbridgett.com  
JUSTIN P. THIELE, SBN 311787  
3 jthiele@hansonbridgett.com  
601 W. 5th Street, 3rd Floor  
4 Los Angeles, California 90071  
Telephone: (213) 395-7620

5 GARNER K. WENG, SBN 191462  
6 gweng@hansonbridgett.com  
425 Market Street, 26th Floor  
7 San Francisco, California 94105  
Telephone: (415) 777-3200

8 Attorneys for Plaintiff and Counterclaim-  
9 Defendant LYMI Inc.

10  
11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**  
13

14 LYMI Inc.,  
15 Plaintiff,  
16 v.  
17 Few Moda, Inc.,  
18 Defendant.

19 Few Moda, Inc.,  
20 Counterclaimant,  
21 v.  
22 LYMI Inc.,  
23 Counterclaim-Defendant.  
24

Case No. 2:24-cv-4564-GW-RAO

**Plaintiff And Counterclaim-  
Defendant LYMI Inc.’s Answer to  
Defendant And Counterclaimant Few  
Moda, Inc.’s Counterclaims**

**DEMAND FOR JURY TRIAL**

Judge: Hon. George H. Wu

25  
26 Plaintiff and Counterclaim-Defendant LYMI Inc. (“Reformation” or  
27 “Plaintiff”) hereby answers the Counterclaims contained in the First Amended  
28

1 Answer, Affirmative Defenses and Counterclaims (Dkt. No. 37) of Defendant and  
2 Counterclaimant Few Moda Inc. (“Few Moda” or “Defendant”) as follows.

3 Reformation denies each and every allegation contained in Few Moda’s  
4 Counterclaims, except as specifically admitted or explained as follows. To the extent  
5 that the headings or any other non-numbered statements in Few Moda’s  
6 Counterclaims contain any allegations, Reformation also denies each and every  
7 allegation.

8 **ANSWER**

9 **The Parties**

10 1. In response to Paragraph 1 of the Counterclaims, Reformation lacks  
11 knowledge or information sufficient to form a belief as to the truth of the allegations  
12 contained in this paragraph and, on that basis, denies them.

13 2. In response to Paragraph 2 of the Counterclaims, Reformation admits  
14 that it is a Delaware corporation with its principal place of business in Vernon,  
15 California.

16 **Jurisdiction and Venue**

17 3. Paragraph 3 of the Counterclaims contains legal conclusions to which  
18 no responses are required. To the extent a response is required, Reformation admits  
19 that Few Moda asserts counterclaims against it seeking a declaration for alleged  
20 copyright and trademark invalidity arising under the copyright and trademark laws  
21 of the United States, but denies Few Moda is entitled to the relief requested therein  
22 or that Reformation violated any statute.

23 4. Paragraph 4 of the Counterclaims contains legal conclusions to which  
24 no response is required.

25 5. Paragraph 5 of the Counterclaims contains legal conclusions to which  
26 no response is required. To the extent a response is required, Reformation admits  
27 that it does business in the District and maintains its principal place of business  
28 within the District and is subject to the Court’s personal jurisdiction.

**First Counterclaim**

**Declaratory Judgement of Invalidity of Copyright Registrations**

6. Reformation incorporates and restates its answers to paragraphs 1 through 5 of the Counterclaims.

7. Reformation denies the allegations of Paragraph 7 of the Counterclaims.

8. Reformation denies the allegations of Paragraph 8 of the Counterclaims.

9. Paragraph 9 of the Counterclaims contains legal conclusions to which no response is required. To the extent a response is required, Reformation denies the allegations of Paragraph 9 of the Counterclaims.

10. Paragraph 10 of the Counterclaims contains legal conclusions to which no response is required. To the extent a response is required, Reformation denies the allegations of Paragraph 10 of the Counterclaims.

**Second Counterclaim**

**Declaratory Judgement of Trademark Invalidity (Orange Grove)**

11. Reformation incorporates and restates its answers to paragraphs 1 through 10 of the Counterclaims.

12. Reformation denies the allegations of Paragraph 12 of the Counterclaims.

13. Reformation denies the allegations of Paragraph 13 of the Counterclaims.

14. Reformation denies the allegations of Paragraph 14 of the Counterclaims.

15. Paragraph 15 of the Counterclaims contains legal conclusions to which no response is required. To the extent a response is required, Reformation denies the allegations of Paragraph 15 of the Counterclaims.

1           16. Paragraph 16 of the Counterclaims contains legal conclusions to which  
2 no response is required. To the extent a response is required, Reformation denies the  
3 allegations of Paragraph 16 of the Counterclaims.

4                                   **Prayer for Relief**

5           In response to the Prayer for Relief, Reformation respectfully requests that  
6 Few Moda's request for judgment and award of costs and attorneys' fees be denied,  
7 Reformation be awarded costs and fees incurred in defending the Counterclaims,  
8 and Reformation be granted such other relief as the court deems appropriate.

9                                   **AFFIRMATIVE DEFENSES**

10          Without admitting or acknowledging that it bears the burden of proof as to  
11 any of them, Reformation asserts the following affirmative and other defenses to  
12 Few Moda's Counterclaims. Reformation reserves the right to assert additional  
13 affirmative defenses that further investigation or discovery indicates are proper.  
14 Moreover, any defense asserted, or fact alleged in support of any defense, does not  
15 constitute a waiver of any of the foregoing denials.

16                               **FIRST AFFIRMATIVE DEFENSE**

17                               **(Failure to State a Claim)**

18          The Counterclaims fail to state facts sufficient to constitute its two enumerated  
19 counterclaims. Specifically, Few Moda's counterclaims seek to adjudicate issues that  
20 are inherent in Reformation's case-in-chief in the claims in Reformation's  
21 complaint, and are therefore superfluous, and, independently, Few Moda's  
22 allegations do not entitle it to the relief it seeks.

23                               **SECOND AFFIRMATIVE DEFENSE**

24                               **(Equitable Defenses)**

25          The Counterclaims are barred in whole or in part because of Few Moda  
26 having waived any rights at issue in its counterclaims, being estopped from raising  
27 the issues in its counterclaims, Few Moda's acquiescence, Few Moda's unclean  
28

1 hands, and/or laches, for which a reasonable opportunity for further investigation or  
2 discovery is likely to provide support.

3 **Wherefore, Reformation Prays for Relief as Follows:**

4 1. That the Counterclaims be dismissed, with prejudice and in their  
5 entirety;

6 2. That Few Moda take nothing by reason of its Counterclaims, and that  
7 judgment be entered against Few Moda and in favor of Reformation;

8 3. That Reformation be awarded its attorney's fees and costs incurred in  
9 defending this action; and

10 4. That Reformation be granted such other and further relief as the Court  
11 may deem just and proper.

12  
13 DATED: March 13, 2025

HANSON BRIDGETT LLP

14  
15  
16 By: /s/ Justin Thiele  
17 RAFFI V. ZEROUNIAN  
18 GARNER K. WENG  
19 JUSTIN P. THIELE  
20 Attorneys for Plaintiff and Counterclaim-  
21 Defendant LYMI Inc.  
22  
23  
24  
25  
26  
27  
28

## Demand for Jury Trial

Pursuant to Fed. R. Civ. P. 38 and Local Rule 38-1, Plaintiff and Counterclaim-Defendant LYMI Inc. demands a trial by jury on all issues so triable.

DATED: March 13, 2025

HANSON BRIDGETT LLP

By: /s/ Justin Thiele

RAFFI V. ZEROUNIAN

GARNER WENG

JUSTIN P. THIELE

Attorneys for Plaintiff and Counterclaim-  
Defendant LYMI Inc.